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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARY JEAN LAMBERT,

Plaintiff,

v.

PROPERTY AND CASUALTY INSURANCE  
COMPANY OF HARTFORD; HARTFORD  
UNDERWRITERS INSURANCE  
COMPANY, companies and entities licensed to  
do business in Arizona and Nevada; DOES 1  
through 10; XYZ Corporations 11 through 20;  
and ABC Limited Liability Companies 21  
through 30, inclusive,

Defendants.

Case No.: 2:17-cv-01509-RFB-PAL

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES  
(SECOND REQUEST)**

Defendant Property and Casualty Insurance Company of Hartford (**Defendant**), incorrectly named as Hartford Underwriters Insurance Company, and plaintiff Mary Jean Lambert (**Plaintiff**), respectfully submit the following stipulation requesting a sixty (60) day extension of the current scheduling order deadlines.

**I. INTRODUCTION.**

This case is a dispute arising out of an automobile insurance policy. Plaintiff allegedly suffered injuries as a result of a motor vehicle collision on April 11, 2012, and made a claim on her insurance policy. Plaintiff filed a complaint in State Court on April 17, 2017, alleging breach of

1 contract, contractual breach of implied covenant and good faith and fair dealing, and unfair claims  
2 practices. On May 26, 2017, Defendant removed this matter to Federal Court. A discovery plan and  
3 scheduling order was entered on August 24, 2017 [ECF Docket #12]. A stipulation and order to  
4 extend discovery deadlines was entered on November 29, 2017 [ECF Docket #19].

5 **II. DISCOVERY STATUS.**

6 On November 29, 2017, the court entered a stipulation and order to extend discovery  
7 deadlines which set the following deadlines:

- 8 (a). Discovery Cut Off: Monday, April 2, 2018.
- 9 (b). Motions to amend pleadings or add parties: No extension requested.
- 10 (c). Initial Expert Disclosures: Friday, February 2, 2018.
- 11 (d). Rebuttal Expert Disclosures: Monday, March 5, 2018.
- 12 (e). Interim Status Report: Friday, February 2, 2018.
- 13 (f). Dispositive Motions: Tuesday, May 1, 2018.
- 14 (g). Pretrial Order: Friday, June 1, 2018.
- 15 (h). Extensions or Modifications of the Discovery Plan and Scheduling Order:  
16 Monday, March 12, 2018.

17 A. Discovery that has been completed.

- 18 1. Plaintiff served her initial disclosures on August 15, 2017.
- 19 2. Plaintiffs served her first supplement to initial disclosures on August 18, 2017.
- 20 3. Defendant served its initial disclosures on August 18, 2017.
- 21 4. Plaintiff served her second supplement to initial disclosures on September 7,  
22 2017.
- 23 5. Plaintiff served her designation of expert witness on September 7, 2017.
- 24 6. Defendant served its first set of requests for production of documents and first  
25 set of interrogatories to Plaintiff on September 21, 2017.
- 26 7. Plaintiff served her first supplement to designation of expert witness on  
27 October 11, 2017.
- 28

8. Plaintiff served her responses to defendant's request for production of documents and answers to defendant's interrogatories on November 15, 2017.

9. Plaintiff served her second supplement to designation of expert witness on January 7, 2018.

B. Discovery that Remains.

1. Expert disclosures;
2. Depositions of Plaintiff's treating physicians;
3. Deposition of Expert Witnesses;
4. Written Discovery;
5. Plaintiff's deposition (and follow up discovery on any new issues that arise at the deposition)

The parties reserve the right to take additional discovery during the time frames outlined below should the need arise.

C. Pending Motions.

There are currently no pending motions before the court.

III. REASON WHY EXTENSION IS REQUIRED.

The parties are requesting an additional sixty (60) days of discovery in order to allow Defendant to continue gathering documentation necessary to retain expert witnesses. This case involves a large volume of medical records, many of which have only recently been received. Defendant received a blank HIPAA form from Plaintiff in October of 2017 and medical records requests were subsequently submitted. Defendants are still in the process of receiving records related to these requests, and need additional time to review these records for purposes of retaining experts. This request is being made in a timely manner. The parties believe that good cause is demonstrated.

IV. PROPOSED SCHEDULE.

- (a). Discovery Cut Off: **Friday, June 1, 2018.**
- (b). Motions to amend pleadings or add parties: **No extension requested.**
- (c). Initial Expert Disclosures: **Tuesday, April 3, 2018.**
- (d). Rebuttal Expert Disclosures: **Friday, May 4, 2018.**

- (e). Interim Status Report: **Tuesday, April 3, 2018.**
- (f). Dispositive Motions: **Monday, July 2, 2018.**
- (g). Pretrial Order: **Tuesday, July 31, 2018.**
- (h). Extensions or Modifications of the Discovery Plan and Scheduling Order:  
**Friday, May 11, 2018.**

The parties believe that the sixty (60) day extension of the deadlines in discovery are necessary and appropriate to provide sufficient time for counsel to familiarize herself with this case.

DATED this 23rd day of January, 2018.

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**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that no further extensions will be granted.

  
UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_ February 5, 2018